

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION

IN RE:
YULANDA SHENELLE WARNER
DEBTOR(S).

CASE NO. 13-30380-D
CHAPTER 13

VERIFIED MOTION TO EXTEND AUTOMATIC STAY

Comes now the Debtor, by and through counsel, and represents to the Court as follows:

1. That the Debtor has had one prior pending case dismissed within the last year because:
The debtor filed case number 13-27453 on 07/16/2013 and it was dismissed on 09/12/2013 because Debtor failed to appear at her 341 Meeting of Creditors due to her work schedule and complications with her employer letting her leave work.
2. That the Debtor's financial or personal affairs have substantially changed since the dismissal of the prior case and the Debtor feels that she can fund and fully perform her plan because: Debtor is now past the probation period at her job and her employer will allow her to leave work to attend all hearings.
3. That Paragraph 20 of Schedule J accompanying the Chapter 13 petition signed by the Debtor provides:
Total projected monthly income: \$1,375.83
Total projected monthly expenses: \$1,025.00
Monthly net income: \$350.83
4. That the proposed plan payment is \$158.00 bi-weekly via an employer's deduction.
5. That the Debtor's prior Chapter 13 case was not dismissed because the Debtor failed to provide adequate protection ordered by the Court or after the Debtor failed to file or amend the petition or other documents as required by the Bankruptcy Code or the Court without substantial excuse.
6. That Debtor's prior Chapter 13 case was not dismissed while an action under section 362(d) of the Bankruptcy Code was pending or after such an action had been resolved with an order terminating, conditioning, or limiting the stay.
7. That this petition was filed in good faith as to the creditors to be stayed and the Debtor believes he can fully perform the terms of the proposed plan should it be confirmed by this Honorable Court.

WHEREFORE, PREMISES CONSIDERED, your Debtor moves this Court under section 362(c)(3) to extend the automatic stay under section 362(a) as to all creditors for the duration of this Chapter 13 case until such time as the stay is terminated, modified, or annulled under section 362(d) of the Bankruptcy Code or further order of the Court.

Respectfully submitted,

/s/ Arthur E. Ray, Jr. #5173
Arthur E. Ray, Jr. #5173
Attorney for Debtor(s)
6244 Poplar Ave., Ste 150
Memphis, TN 38119
Tel (901) 682-1500, Fax (901) 881-9680
Email: bank@memphislaw.com

CERTIFICATION OF DEBTOR(S)

I, Debtor, declare under penalty of perjury that I have read the statements contained in the foregoing motion and that they are true and correct to the best of my knowledge.

/s/ Yulanda Shenelle Warner
Debtor

Date: September 27, 2013

CERTIFICATE OF SERVICE

I certify that copies of this document were sent to the following by first class U.S. Mail on or before September 30, 2013.

/s/Arthur E. Ray, Jr. 5173

Debtor(s)
Chapter 13 Trustee
All entities on matrix